

November 26, 2007

Mr. Sui Lang Panoke  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: Born Fighting PAC  
FEC ID No. C00430819

Dear Mr. Panoke:

This is in response to your letter dated October 31, 2007 concerning the Mid-Year Report (1/1/07-6/30/07) of Born Fighting PAC (the "Committee").

You have asked about expenditures for "Catering," "Equipment Rental, Facility Rental, & Catering," "Facility Rental," "Fundraising Consulting/Catering/Travel," "Fundraising Consulting Services," "Fundraising Consulting Srvcs. and Travel," and "Fundraising Consulting Services/Travel". These expenditures were for the Committee's own fundraising activities and were not made on behalf of any specifically identified federal candidate.

You also asked about expenditures for "Fundraising Consulting Services/Postage," "Office Supplies/Postage/Shipping," and "Printing." These expenditure were for the Committee's own activities and were not for public communications or voter drive activity.

Finally, you have asked about the payments for the Committee's administrative expenses. Born Fighting PAC is a small committee that has few administrative expenses. Currently, it has no paid staff members, no rented office space and relies primarily on our firm, Perkins Coie LLP, and a fundraising firm to administer the Committee's activities. All of the expenses incurred to operate the Committee, including payments to its consultant, have been reported as federal operating expenditures on the Committee's FEC reports.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,  
Marc Elias  
Counsel to Born Fighting PAC

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